

Members of the Federal Communication Commission:

I would like to go on the record in OPPOSITION to the proposal to loosen regulations governing Broadband over Power Lines (BPL). Rather, I would propose that regulations be strengthened to limit deployment until technology can be employed to ensure that the widespread use of BPL does not do irreparable damage to existing radio services.

As an amateur radio operator (call sign AF4VJ) and shortwave radio listener, I strongly encourage you to examine the very real risk of interference to other radio services that is posed by today's BPL.

Present BPL systems operate using radio frequency energy transmitted over unshielded power lines with frequencies of 2 to 80 MHz; frequencies containing allocations to the amateur radio and other services in HF and other services (including television audio) in the low VHF range.

The transmission of radio frequency energy over unshielded power lines—such as occurs with access BPL—has been shown in field tests conducted by the American Radio Relay League to cause devastating interference to the reception of amateur radio signals. The

signals emanating from BPL-enabled power lines were demonstrated to block the reception of all but the strongest amateur radio signals with a nearly-impenetrable wall of noise. As a volunteer for the amateur radio station at the National Hurricane Center

(WX4NHC), I can confirm that the information of greatest importance in an emergency is not often carried by the strongest signals!

The value of the Amateur Service has been demonstrated year in and year out with lives saved through the knowledge and dedication of amateur radio operators—using the very spectrum that would effectively be taken away from them, should BPL be implemented

on a widespread basis. The value of other services would likewise be diminished by the interference BPL would cause.

In conclusion, I urge you to carefully consider the negative effects of BPL on existing radio services and delay changing Commission regulations until BPL technology improves, so that it does not cause harmful interference to other radio services.

Sincerely,

N. Michael Davis
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